

# Exhibit 14

## 3505-15

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: JUUL LABS, INC., MARKETING, :  
SALES PRACTICES, AND PRODUCTS : No.  
LIABILITY LITIGATION : 19-MD-02913-WHO  
:

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REMOTE VIDEO-RECORDED  
DEPOSITION OF QUARRY PAK

Volume I

October 7, 2021

Job No. 200253

Stenographically reported by:  
LAURA AXELSEN, CSR NO. 6173  
RMR, CCRR, CRR, CRC

1 Q. That's not necessary. The question was are  
2 they funded by the PEEF fund and you answered that  
3 no some time ago.

4 A. No, those funds go for the site nurses at  
5 school sites.

6 Q. Okay. And so you mentioned that --

7 A. I was answering the central nurses funding.  
8 I thought you asked that. I was mistaken.

9 Q. Okay. So, ma'am, what types of training  
10 does the TUPE program fund?

11 A. We're required to provide teacher training  
12 on the curriculum that addresses tobacco use and  
13 prevention education for middle and high school  
14 students. We also are responsible for training  
15 providers on brief intervention services,  
16 school-based providers, and our community partners.  
17 And we're also required to train our youth outreach  
18 workers and peer educators.

19 And we're also, uhm, tasked to reviewing  
20 tobacco-free policies to make sure that the schools  
21 are aware that these are the policies, provide them  
22 signage, and also the discipline policies as it  
23 relates to tobacco.

24 Q. And are there any staff resources dedicated  
25 to student education on tobacco products besides

1 those funded by the TUPE grant?

2 MR. DOUGLAS: Object to form.

3 THE WITNESS: Not that I'm aware of.

4 MR. OSBORNE: Q. Okay. Are there any  
5 other staff resources dedicated toward tobacco  
6 education for families besides those funded by the  
7 TUPE grant?

8 A. Not that I'm aware of.

9 Q. Just so I'm clear, when you say not that  
10 you're aware of, you're testifying on behalf of the  
11 District, correct?

12 A. Yes, yes.

13 Q. And, ma'am, are there any other staff  
14 resources that are used on tobacco education for  
15 parents and teachers beyond the resources funded by  
16 the TUPE grant?

17 A. The resources that we have are the  
18 student's peer education -- uhm, students are  
19 trained -- the resources that are funded by PEEF and  
20 the other sources and nurses and the social workers,  
21 they are part of our support system and provide  
22 education support. So they're not funded by the  
23 TUPE grant, so they provide that. And the teachers  
24 and administrators and counselors are involved.

25 So, I mean, it's the responsibility of